

SECTION 7.0



CUMULATIVE IMPACTS

7.0 CUMULATIVE IMPACTS

CEQA Guidelines define cumulative effects as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” The Guidelines further state that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects (Section 15355). The Guidelines allow for the use of two alternative methods to determine the scope of projects for the cumulative impact analysis:

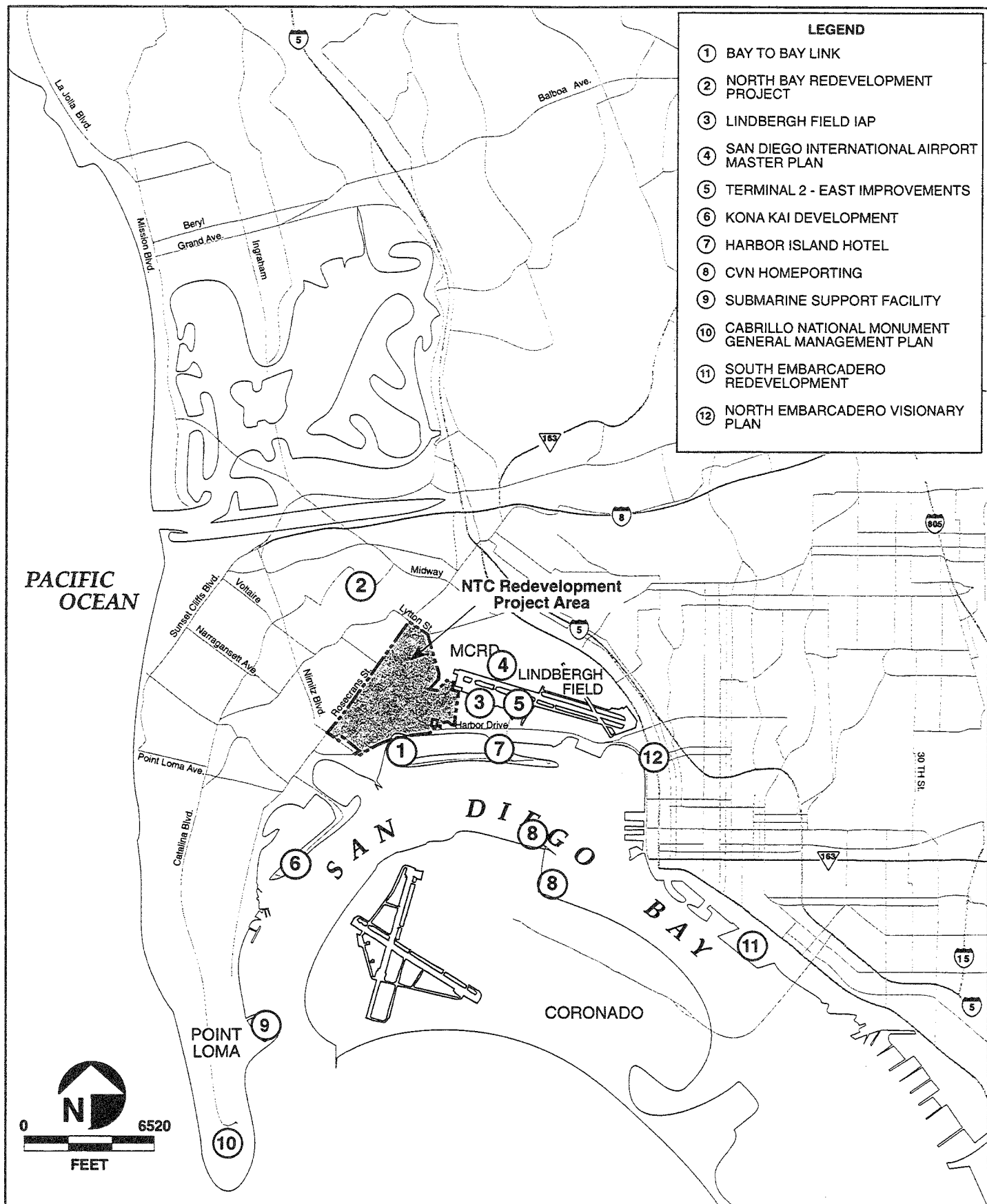
- List Method – A list of past, present, and reasonably foreseeable future projects producing related or cumulative impacts, including those projects outside the control of the agency.
- General Plan Projection Method – A summary of projections contained in an adopted General Plan or related planning document that is designed to evaluate regional or areawide conditions (Section 15130).

For the purpose of this EIR, the List Method was selected to conduct the cumulative impact analysis.

A total of 15 past, present, and reasonably foreseeable projects have been included in the analysis. Each project is briefly described below. Analysis of the environmental impacts associated with these projects has been or will be conducted separately with the results incorporated into documents prepared specifically for these projects. Cumulative impacts resulting from construction of these projects together with the Project are discussed in Section 5.2. The full range of environmental resource areas addressed in Section 4 of this Environmental Impact Report (EIR) is also evaluated from a cumulative impact standpoint.

7.1 CUMULATIVE PROJECTS

Figure 7-1 illustrates the location of the cumulative projects in the vicinity of the NTC Redevelopment Project Area. To analyze the potential environmental effects of these



FIGURE

7-1

projects in conjunction with the proposed Project, environmental documentation for approved projects and unpublished environmental studies were reviewed.

7.1.1 Bay-to-Bay Link Project

Three public charettes were held to explore possibilities for linking San Diego and Mission Bays. The bay-to-bay link concept provides for a long-term vision for the Midway area. Development of the link would conceivably consist of three segments: 1) parkland connection between the Project Area and Old Town, 2) extension of the canal along Sports Arena Boulevard to the Sports Arena site, and 3) separated canal within the San Diego River Flood Control Channel, allowing the ultimate confluence of water between the two bays. A Summary Report describing the results of the public charettes was prepared in the fall of 1994. Subsequent environmental review would be required as the planning process evolves. The bay-to-bay link concept is incorporated into the vision for the NTC San Diego Reuse Plan.

7.1.2 North Bay Redevelopment Project

On August 14, 1997, the San Diego Planning Commission approved the North Bay Redevelopment Project Preliminary Plan. The City Council adopted the North Bay Redevelopment Project on May 4, 1998.

The proposed project area includes approximately 1,360 acres of land. Within the proposed boundaries are areas consisting of the Midway/Pacific Highway Community Planning Area, and portions of the Peninsula, Old Town, Uptown, Mission Valley, Linda Vista, and Claremont Mesa planning areas.

The land uses in the North Bay project area would conform to the City Progress Guide and General Plan and the affected community plans, as they may be amended during the redevelopment adoption process.

Redevelopment would be used in the project area to accomplish: 1) elimination of existing blighting conditions, 2) the replacement of obsolete and deteriorated public improvements and facilities, 3) the rehabilitation of commercial and residential structures, 4) planning, redesign, and development of areas that are underutilized, 5) participation of

owners and tenants in the revitalization of their properties, 6) provision of affordable housing, and 7) revitalization of commercial districts.

7.1.3 Lindbergh Field Expansion

The SDUPD implemented its Immediate Action Program (IAP). The IAP was designed by the SDUPD to relieve immediate congestion at Lindbergh Field and is based on improvements to the most critical passenger processing element of the airport facility. The IAP consists of several facility-related improvements (all of which have been completed) needed to accommodate the projected increased passenger demand, including:

- addition of a new eight-gate air passenger terminal concourse;
- development of the West Terminal apron;
- modification of existing parking and airport roadway improvements including construction of a signalized intersection at Harbor Drive and Harbor Drive interchange modification;
- expansion of the airport fuel farm; and
- regional access improvements, including widening of Laurel Street between Harbor Drive and Pacific Highway.

The Lindbergh Field expansion was completed by the SDUPD under its IAP.

7.1.4 San Diego International Airport Master Plan

The SDUPD is currently developing a Master Plan for the San Diego International Airport, which will determine how to optimize the airport's capabilities to accommodate its projected growth in air travel. A development plan was presented on July 27, 1999, and consists of the following phases:

- construction of a new ten-gate terminal, a new apron, roadway improvements on the north side of the airport along Pacific Highway, and relocation of a regional air carrier for completion between 1999 and 2005;
- expansion of the new north terminal by four gates, construction of an intermodal transportation center along Pacific Highway between Palm Avenue and Sassafras Street, and roadway improvements for completion between 2005 and 2010;
- construction of a new runway and relocation of cargo operations to the north side of the airport for completion between 2010 and 2020; and
- construction of a double-deck roadway system at existing South Terminals 1 and 2 and expansion of Terminal 2 by eight gates for completion between 2010 and 2020.

7.1.5 Terminal 2-East Improvements

The SDUPD proposes to renovate underutilized areas and existing gates in the Terminal 2-East building at the San Diego International Airport, and to construct a covered walkway extension between Terminals 1 and 2. The project will remodel approximately 64,500 square feet of existing space and add approximately 13,890 square feet of space. A Final Negative Declaration was completed in October 1999; the project is anticipated to be implemented by June 2000.

7.1.6 Kona Kai Development

The SDUPD was the lead agency for the Kona Kai development on Shelter Island. A Final EIR (1990) was prepared for the project. The project involved the demolition of the original Kona Kai Club and Hotel, which was built in 1938. The structures were replaced with 4 structures limited to 41 feet in height and extensive landscaping. The new facility includes a 206-room hotel.

7.1.7 Harbor Island Hotel

The SDUPD is the lead agency for the Harbor Island Hotel project. The SDUPD will issue a request for proposals to build a 500-room hotel on Harbor Island. The property is located southeast of the intersection of Harbor Drive and North Harbor Drive, a short distance from Lindbergh Field and is currently used as an airport employee parking lot. A Final EIR was prepared for this project. The site consists of 6.4 acres of land intended for hotel development, 1.16 acres of land intended for open space (landscape and hardscape), and 0.85 acre of water area intended for a hotel guest dock or mooring facility. The project consists of: 1) the private development of a resort-oriented hotel of 400 to 500 guest rooms on Harbor Island including restaurants and cocktail lounges, meeting and conference facilities, retail shops, recreation facilities such as a swimming pool and tennis courts, onsite parking, and extensive landscaping; 2) amending the Port Master Plan to incorporate 1.24 acres of adjacent land currently designated as “Industrial Business Park” into the proposed hotel site; and 3) replacing the main Harbor Island Drive traffic circle with a modified “T” intersection, and upgrading sewer capability to accommodate the proposed hotel development.

7.1.8 Homeport Siting Analysis for Additional Nimitz-Class Aircraft Carriers in Support of the United States Pacific Fleet

The EIS currently being prepared for this project analyzes potential impacts of locating additional Nimitz-class nuclear-powered aircraft carriers (CVNs) within the United States Pacific Fleet area at any one of four alternative homeport sites. A maximum of two CVNs could be homeported at Naval Air Station North Island (NASNI) adjacent to Coronado, California near San Diego. Other potential homeporting locations include Puget Sound Naval Shipyard (PSNS) Bremerton, Washington; Naval Station (NAVSTA) Everett, Washington, or Pearl Harbor Naval Shipyard (PHNSY), Hawaii. This proposed action stems from a decision made in 1994 by the Chief of Naval Operations (CNO) directing the United States Pacific Fleet to receive over time a total of five Nimitz-class CVNs. The five Pacific Fleet CVNs are needed to replace existing conventionally powered aircraft carriers (CVs) that will reach the end of their service lives in the late 20th and early 21st centuries, except for a sixth Pacific fleet aircraft carrier (a CV) that would remain deployed in Japan. The Navy needs to determine the most appropriate permanent homeport location(s) for the two additional CVNs that will join the Pacific Fleet in the

future, replacing two CVs currently homeported at NASNI, and wants to reevaluate the current location of one CVN homeport at NAVSTA Everett, in order to increase efficiency of support infrastructure, maintenance, and repair capabilities and to enhance crew quality of life.

The first additional CVN is expected to arrive in 2002. The second CVN is expected to arrive in 2005 (for a total of three CVNs homeported).

The homeporting of CVNs at any of the four alternative sites would require provision of facilities and infrastructure. At NASNI, proposed improvements for a maximum of two CVNs would include components of military construction (MILCON) P-700A: a CVN warehouse (28,000 square feet), a Fleet Support Building (5,000 square feet), an Equipment Laydown Building (2,500 square feet), a CVN Berthing Wharf (1,300 x 90 feet, totaling 117,000 square feet), relocation of the P-700A ferry/flag landing, and demolition of Pier J/K and seaplane ramps. The CVN homeporting berth turning area would be deepened by dredging approximately 250,000 cubic yards (cy) (190,400 cubic meters [m^3]) of sediment.

7.1.9 Submarine Support Facility – SUBASE San Diego

As part of the Quadrennial Defense Review, the Navy intends to decommission the submarine tender vessel United States Sovereign (USS) MCKEE. The combination of MCKEE, the floating dry dock, ARCO, and Building 633 comprise the non-radiological and radiological integrated maintenance infrastructure for submarines berthed at Submarine Base (SUBASE) San Diego. As such, the Navy plans to replace the MCKEE's submarine maintenance capability with a shore-based facility at SUBASE, thereby retaining integrated submarine maintenance infrastructure within Naval Port San Diego. The proposed action included the construction and operation of a Submarine Support Facility (SSF), facilitating radiological propulsion plant maintenance, and the incorporation of non-radiological maintenance into Building 633. An Environmental Assessment was prepared for this project.

7.1.10 Cabrillo National Monument General Management Plan

Cabrillo National Monument is located in San Diego County at the southern end of Point Loma. It is an enclave within the federal military reservation on Point Loma and is administered by the National Park Service (NPS). The monument is bordered by the Naval Submarine Base, San Diego, on the north and northeast; the Naval Command Control and Ocean Surveillance Center on the north, south, and west; the City of San Diego Point Loma Wastewater Treatment Plant on the northwest; and the United States Coast Guard Point Loma Light Station on the southwest.

The NPS has proposed a general management plan (GMP) for the monument to provide a blueprint to guide park management decisions and offer strategies for addressing issues and achieving identified management plans over a 10- to 15-year period. The proposed GMP would add staff and services to better protect and interpret the monument's significant resources. The GMP specifically proposes to enhance protection and restoration of natural and cultural resources, improve visitor facilities, and better accommodate existing visitor activities.

Proposed changes to the monument include the following: relocating the entrance station; constructing an interpretive center at the lighthouse and improving lighthouse landscaping; providing access to and interpretation of some historic coastal defense structures; conversion of the Marine Science Facility to an intertidal interpretive center if the facility is declared excess to the Navy's needs and is transferred to the monument; improving outdoor seating facilities at the Ballast View rest area; replacing the Whale Overlook; extending the Bayside Trail; and adding administrative and storage space.

7.1.11 South Embarcadero Redevelopment

The SDUPD has proposed two development projects that will add 2,500 to 3,000 hotel rooms over the next 10 years, along with associated retail development, in the Centre City South Embarcadero area of the San Diego Bay waterfront. The projects would support the future expansion of the Convention Center by providing full-service hotels with meeting space, food and beverage outlets, recreation facilities, and business center commodities.

The Convention Center east hotel development project would include construction of a 1,400,000-square-foot high-rise hotel with 1,000 to 1,400 rooms, an above-grade parking structure with a minimum of 1,200 spaces, and a 250- to 325-slip marina. The existing pedestrian promenade along the Embarcadero waterfront would be extended and would allow for a public gathering space at the terminus of Eighth Avenue. The pedestrian access way along Eighth Avenue from Harbor Drive to the waterfront would also be widened.

The Fifth Avenue Landing project includes the construction of a 398,000-square-foot boutique hotel with 210 rooms, a restaurant, meeting room, and an aboveground parking area with a minimum of 240 spaces. Berths for water transportation vessels will be included in the development of this project, which would allow for transport of passengers to and from locations around San Diego Bay to Qualcomm Park and the Convention Center. The Embarcadero pedestrian promenade will also be extended through the site.

7.1.12 North Embarcadero Visionary Plan

The North Embarcadero Visionary Plan proposes development of 206.1 acres of commercial recreation land uses along San Diego's downtown waterfront. The purpose of the plan is to establish the location and character of public plazas, parks, piers, and other public amenities; the circulation pattern and parking strategy to support development and public access; and the location, intensity, and character of commercial and residential development. Possible development projects include an aircraft carrier museum, county administration center parking lots, a cruise ship terminal at the B Street Pier, and improvements to pedestrian access ways along the Embarcadero and east-west streets in the downtown area. In addition, an 800-room hotel, 400,000-square-foot office building, and associated parking areas would be constructed on a 5.9-acre site along Pacific Highway.

7.1.13 America's Cup Harbor/Shelter Island Master Plan

The SDUPD is currently preparing a master plan for the America's Cup Harbor project. Current land uses as well as opportunities to reconfigure the land uses are being studied. General development assumptions have been made to account for anticipated growth

associated with this project. Detailed project development information is currently not available and is therefore not shown in Figure 7-1.

7.1.14 Local Agency Military Base Recovery Area

Local Agency Military Base Recovery Area (LAMBRA) legislation (AB 693) was drafted to stimulate job creation in areas experiencing military base downsizing and closure, and was signed into law in October 1993. LAMBRA's goal is to encourage private investment, business retention, and new business by streamlining regulatory controls, thereby increasing cooperation and innovation between state and local governments to attract private investment, business, and industry. Benefits from this program include employment opportunities for area residents, a decreased unemployment rate, and an increased tax base that collectively help to stabilize and diversify a community's economic base. The LAMBRA zone would be located within the boundaries of the Project Area.

7.1.15 North Bay and Beach Area Guideway Study

The Metropolitan Transit Development Board (MTDB) is currently in the preliminary planning stage of the North Bay and Beach Area Guideway (NB&BAG) Study, which covers the NTC Redevelopment Project Area, Midway area, Old Town, Sports Arena area, Ocean Beach, and Mission Beach. The study's objective is to develop sufficient information regarding alignments, station locations, capital costs, operating costs, environmental impacts, and ridership for the North Bay and beach areas to determine project feasibility and whether to proceed with further project study. This study is in the preliminary stages and is therefore not presented in Figure 7-1.

7.2 CUMULATIVE IMPACTS ANALYSIS

7.2.1 Land Use

Land use impacts were assessed based on the Project's potential to be incompatible with existing or proposed land uses, to be inconsistent with applicable land use policies, or to result in inappropriate commitment of land resources. All land use impacts can be mitigated to below a level of significance.

The proposed cumulative projects are consistent with the efforts of the City, Navy, and SDUPD to redevelop and enhance the area with compatible uses without creating significant cumulative impacts. Most of the goals and objectives established for each of the projects and associated planning documents (e.g., Peninsula Community Plan/LCP, General Plan, and NTC San Diego Reuse Plan) would be met. The Project in conjunction with the cumulative projects would be beneficial to and contribute toward stimulating the redevelopment area with appropriate urban land uses. Therefore, cumulative land use impacts would not occur as a result of the proposed Project in conjunction with surrounding projects.

7.2.2 Transportation and Circulation

The traffic study referenced for this Project was based on San Diego Association of Governments' (SANDAG's) anticipated traffic conditions for the region. The SANDAG Regional Model uses 2015 as its horizon year. SANDAG's model was modified to reflect the internal Project Area roadway system, areawide transportation improvements likely to be constructed by the year 2015, recent changes to areawide land uses, and implementation of the Project. Included in the model as cumulative projects were Midway Center, Kona Kai, and Harbor Island.

The Kona Kai development on Shelter Island would generate approximately 1,900 average daily trips (ADT). Mitigation measures associated with this development include reconstruction of the north/south roadway between Harbor Island Drive and North Harbor Drive to provide a T-intersection. These improvements have already been implemented and the SANDAG model has been revised accordingly.

Evaluation of roadway segments in the cumulative study area indicated level of service (LOS) E or F conditions on 52 roadway segments with traffic generated from the cumulative projects and growth in the area. Evaluation of freeway segments in the area indicated that 32 segments within the region would be characterized by LOS E or F under the Buildout condition. These conditions would occur with or without the Project under the Buildout condition. Analysis of peak hour intersection capacity indicated congested peak hour LOS E or F at 11 offsite intersections.

As described in Section 4.2 of this EIR, mitigation measures to reduce significant cumulative traffic impacts on roadway and freeway segments by roadway widening are deemed infeasible due to the land use and historical resources constraints of the urbanized, built-out area. A significant unmitigable traffic impact would therefore occur on certain segments with or without implementation of the Project. However, individual projects would be required to contribute their fair share to a fund designated to reduce traffic congestion in the region.

Mitigation measures are available for reducing impacts to most intersections to below a level of significance. Measures to reduce impacts resulting from the Project are described in Section 4.2 of this EIR.

If redevelopment of the property proceeds as planned, there would be an increase in the amount of employment opportunity in the immediate area. With an increase in jobs it is expected that an increase in the number of people living and working in the same area would occur, thus reducing the commute. This would also improve traffic congestion in the region. However, cumulative traffic impacts would be significant and unmitigable.

7.2.3 Cultural Resources

State and local regulations set forth guidelines for determining whether a significant impact would occur as a result of a project. Implementation of these guidelines demonstrated that a significant impact may occur to the Historic District. However, with the incorporation of specific measures outlined in the Memorandum of Agreement (MOA) per Section 106 of the NHRP, the Project would not contribute to a significant direct or indirect cumulative loss of archaeological resources. The NTC Redevelopment Project Area encompasses a sizable historic district. Historic resources onsite would be preserved; therefore, the Project would not contribute to the direct cumulative loss of historic cultural resources. Cumulative impacts to archaeological and historic resources would not occur because cultural resources would be protected either by retaining the historic structure or implementing appropriate mitigation for impacts to an archaeological site

7.2.4 Population, Employment, and Housing

No significant cumulative impacts to population, employment, and housing would occur as a result of implementation of the Project. Beneficial cumulative socioeconomic impacts would occur with implementation of the Project and cumulative projects, including economic growth, and increases in employment and personal income as a result of the creation of new jobs. Housing opportunities associated with the cumulative projects would result in an improvement to the area's housing shortfall.

7.2.5 Infrastructure and Utilities

The cumulative demand placed on public infrastructure and utilities would not result in an adverse increase in service capacities since implementation of the Project would not encourage new growth in an area that is not already serviced. The Project and implementation of cumulative projects would result in only an incremental increase in demand for infrastructure and utilities that would be accommodated by local service providers. Without implementation of the Project, the provision of public infrastructure and utility services would remain in the area. Therefore, cumulative impacts from implementation of the Project would not occur.

7.2.6 Biological Resources

The primary criteria for determining significance of impacts to biological resources are the sensitivity ratings assigned to certain biological resources by federal and state resource agencies, the regional sensitivity of the resource, local significance criteria, and the degree to which the resource may be affected. Based on these criteria, it was determined that certain biological resource impacts would occur. However, mitigation measures provided in Section 4.6 would mitigate all impacts to biological resources to below a level of significance and would result in compliance with the criteria set forth by federal, state, and local agencies.

Although the boat channel and San Diego Bay may not be directly impacted by the Project or the development of cumulative projects, an indirect adverse cumulative impact may occur to waterbird species. The indirect effects of the adjacent land uses and increased human presence would reduce the biological value for the dominant waterbird

species known to use the waters. This cumulative impact would be mitigated through the development and implementation of a baywide Natural Resource Management Planning Program. This program would provide management recommendations to protect the natural resources of San Diego Bay on both SDUPD and Navy tidelands properties. Because the plan would address cumulative impacts to and management of waterbird habitat in the area, cumulative impacts would not occur.

A significant cumulative impact may occur indirectly to North San Diego Bay as a result of changes in the nature of runoff in terms of volume and constituents. Mitigation measures such as containing sediment runoff and erosion control on construction sites using appropriate engineering methods would be implemented and would mitigate impacts to below a level of significance. The projects should also design runoff drainages to empty into areas of San Diego Bay with greater tidal flushing, such as West Harbor Island Marine area.

7.2.7 Geology and Soils

Significance criteria for geology and soils impacts are based on potential for damage caused by seismic or geologic hazards. Redevelopment of the property and development of other projects would be affected to varying degrees by geologic and soil-related hazards. However, both geologic and soil-related hazards are site-specific. Appropriate best management practices (e.g., erosion reduction measures) and incorporation of state-of-the-art seismic measures into design, construction, rehabilitation, operation, and maintenance of the projects would be implemented to reduce impacts to below a level of significance. Therefore, the Project, in conjunction with cumulative projects, would not result in cumulative impacts on geology and soils.

7.2.8 Hydrology and Water Quality

Determination of significant impacts on hydrology and water quality for surface water and groundwater are based upon the criteria of water supply, as well as applicable regulations on use of surface water and groundwater. Implementation of each of the cumulative projects would result in changes of some land uses that may affect water quality, particularly in San Diego Bay and the adjoining boat channel. However, National Pollution Discharge Elimination System (NPDES) permits generally require long-term

sampling and monitoring of stormwater outfalls. Compliance with NPDES permits would reduce potential impacts on surface water quality to below a level of significance; therefore, cumulative impacts would not occur.

With respect to groundwater, if the landscaped surface area increases, there could be a slight rise in the quantities of fertilizers and chemicals leaching into the groundwater. However, since there are no existing beneficial uses of the groundwater, there would be no adverse cumulative impacts to groundwater quality.

7.2.9 Air Quality

Determining impact significance for air quality is based on mandates from federal, state, and local jurisdictions and agencies. These agencies have published emissions thresholds that, when exceeded, would result in a significant impact. Based on these thresholds, it was determined that implementation of the Project would not significantly impact local or regional air quality. It should be noted that with respect to vehicular emissions, the direct air quality impact analysis performed for the Project was based on a year 2015 full build-out trip generation. This effectively equates to a cumulative impact analysis. Therefore, as direct impacts were determined not to be significant, cumulative impacts would not be significant. Also, proposed activities for the cumulative projects would be required to comply with all applicable air pollution control laws. Since it can be reasonably expected that there will be no direct impacts, it is also reasonable to expect that the identified cumulative projects would not contribute to a significant cumulative air quality impact.

7.2.10 Public Health and Safety

Significant public health and safety impacts would occur if the Project resulted in increased hazards. However, public health and safety hazards would be appropriately mitigated on a development-by-development basis. The Project would not contribute to an adverse cumulative health and safety impact. Implementation of the standards as identified in the Comprehensive Land Use Plan (CLUP) for Lindbergh Field would mitigate potential impacts from airport operations to below a level of significance.

7.2.11 Visual Resources

Significant visual resources impacts would occur if the Project resulted in adverse changes to the visual quality or character of the area, if project elements are in stark contrast with the project setting, or if project elements cause a loss of view points or are inconsistent with applicable City of San Diego goals and policies. The Project, in conjunction with other proposed projects in the area, would improve the aesthetic quality of the community, if the cumulative projects are designed appropriately in terms of density, style, and scale. It is assumed that if each of the cumulative projects would result in compatible architecture style, use, and quality to the surrounding area, a positive cumulative visual quality effect would occur. Future required noise attenuation measures would be compatible with the surrounding area and would have visual interest through careful selection of building materials, texture, and color. The Urban Design section of the NTC San Diego Reuse Plan outlines policies and goals to establish a compatible visual character for the Project Area.

7.2.12 Noise

An increase in noise levels along various roadway segments within the cumulative project study area would occur due to the increase in cumulative traffic volumes. Although noise levels are projected to increase along roadway segments, most of this increase is due to increased traffic from general growth in the area as opposed to project-generated traffic. It is generally expected that noise levels and associated ground contours for Lindbergh Field would remain the same to those identified in the Lindbergh Field CLUP. Therefore, the Project would not contribute significantly to cumulative noise impacts.

7.2.13 Hazardous Substances and Wastes

Regulatory standards and guidelines have been applied in determining the impacts caused by hazardous substances and wastes. Development under the Project may result in the use of or exposure to hazardous substances and hazardous wastes. Such activities would be subject to all applicable federal, state, and local regulations to minimize the potential risk to human health and the natural environment. Consequently, cumulative impacts would not occur if the regulations were properly followed. Additionally, property owners

would be advised of the type, condition, and amount of hazardous substances and wastes within any real property conveyed.

7.2.14 Community Services and Facilities

Significant impacts to community services and facilities would occur if projected demand could not be effectively accommodated. With the exception of public schools, the Project would not result in excess demand for community services and facilities. In addition, the provision of community services and facilities would still be required without the implementation of the proposed or cumulative projects. Police and fire protection services already exist in this area; therefore, response times would remain unchanged. In addition, the fire station onsite would remain in use as a fire station. Recreational opportunities in the area would be increased by the cumulative projects and would offset the existing deficiency of parkland. Therefore, the Project would not result in significant cumulative impacts on police and fire protection services or recreational opportunities in the area.

Regarding schools, as indicated in Section 4.14 of this EIR, the Project would generate 358 elementary students, 66 middle school students, and 50 high school students for a total of 474 students. The additional students would exceed existing capacities at both the elementary and middle schools in the community resulting in a significant impact. School impact fees of approximately \$1.3 million, not including fees for hotel construction, would be allocated to the San Diego Unified School District and would offset impacts associated with the additional middle school students. In addition, the affected school districts will receive a statutory share of annual tax increment revenue generated in the Project Area. Finally, 7 acres within the project area will be designated for a new elementary school to be constructed and maintained by the San Diego Unified School District that would accommodate the additional elementary school students. Upon implementation of these measures, cumulative impacts to school facilities would not be significant.

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